

**UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**IN RE:**

**PIONEER CARRIERS, LLC**

**Debtor**

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§

**CASE NO. 16-36356-H4-11  
(Chapter 11)**

**EMERGENCY MOTION TO CONTINUE STATUS CONFERENCE ON WEDNESDAY  
JANUARY 4, 2017**

**THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.**

**REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEYS.**

**EMERGENCY RELIEF HAS BEEN REQUESTED. IF THE COURT CONSIDERS THE MOTION ON AN EMERGENCY BASIS, THEN YOU WILL HAVE LESS THAN 21 DAYS TO ANSWER. IF YOU OBJECT TO THE REQUESTED RELIEF OR IF YOU BELIEVE THAT THE EMERGENCY CONSIDERATION IS NOT WARRANTED, YOU SHOULD FILE AN IMMEDIATE RESPONSE.**

**TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE BOHM:**

Pioneer Carriers, LLC (the "Debtor") hereby requests that this Court re-set the status conference in the above chapter 11 case and respectfully represent:

### **Jurisdiction**

1. This Court has jurisdiction to consider this motion pursuant to 28 U.S.C. §§ 157 and 1334. Consideration of this motion is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

### **2. Background**

3. On December 12, 2016 (the “Commencement Date”), the Debtor filed a voluntary petition for relief under chapter 11 of Title 11 of the United States Code (the “Bankruptcy Code”). The Debtor continues to operate its business and manage its properties as debtor in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.
4. The Debtor owns and operates tractor / trailers for the movement of crude oil. The Debtor has an ongoing agreement for moving the crude oil. Debtor operates in south Texas.
5. This court set a status conference for January 4, 2017 at 11:00 am.
6. Counsel for the Debtor has a trial set in Judge Jones court starting at 9:00 am on January 4, 2017. Counsel does not anticipate that he will complete the trial by 11:00 am or before 2:00 pm.
7. The Debtor has a continued hearing on the use of cash collateral for January 6, 2017, at 9:00 am. Potentially the status conference could be conducted on such date also.

WHEREFORE, the Debtor respectfully requests that the Court continue the status conference from January 4, 2017, until a convenient time for this court, and grant the Debtor such other and further relief as it deems just and proper.

DATED: January 2, 2017

Respectfully submitted,

By: /s/ Reese W. Baker

Reese W. Baker

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*ATTORNEYS FOR  
DEBTOR, PIONEER  
CARRIERS, LLC*

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of this motion was sent to all parties on electronic notification on January 2, 2017.

/s/ Reese W. Baker

Reese W. Baker